

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wweintraub@goodwinlaw.com
E: gfox@goodwinlaw.com

*Counsel to Those Certain Post-Closing Accident
Plaintiffs Represented By Butler Wooten & Peak LLP,
Denney & Barrett, P.C., Hilliard Muñoz Gonzales L.L.P.,
and Turner & Associates, P.A.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**CERTAIN POST-CLOSING ACCIDENT PLAINTIFFS' DESIGNATION OF
ADDITIONAL ITEMS TO BE INCLUDED IN RECORD ON APPEAL**

By and through the undersigned counsel, those certain Post-Closing Accident Plaintiffs¹ represented by Butler Wooten & Peak LLP, Denney & Barrett, P.C., Hilliard Muñoz Gonzales L.L.P., and Turner & Associates, P.A. (the “Appellees”) submit pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure the below additional items to be included in the record with respect to New GM’s appeal from: (i) *the Memorandum Opinion And Order Granting In Part New GM’s Motion To Enforce Sale Order Against The Pitterman Plaintiffs and Resolving 2016 Threshold Issue Two: Whether Non-Ignition Switch Plaintiffs Are Barred From Asserting Independent Claims Against New GM*, entered in the above-referenced

¹ Capitalized terms not otherwise defined herein shall have the meanings given to them in the Order (defined below).

case on June 7, 2017 [Docket. No. 13955]; and (ii) the *Order Granting In Part And Denying In Part General Motors LLC's Motion To Enforce The Ruling In The Bankruptcy Court's June 7, 2017 Opinion With Respect To The Pitterman Plaintiffs*, entered on July 10, 2017 [Docket. No. 13991] (the "New GM Appeal"), and respectfully state as follows:

ADDITIONAL DESIGNATED ITEMS

In addition to the items designated by New GM in its *Appellant's Statement of Issues To Be Presented On Appeal And Designation Of Items To Be Included In The Record On Appeal* [Docket No. 14032], the Appellees hereby designate the following additional items for inclusion in the record with respect to the New GM Appeal (including any exhibit, annex, or addendum thereto):

<u>Description</u>	<u>Filing Date</u>	<u>Docket No.</u>
1. Scheduling Order	9/15/2014	12898
2. Decision on Motion to Enforce Sale Order	4/15/2015	13109
3. Letter Filed on Behalf of General Motors LLC Regarding Other Plaintiffs' Complaints	9/23/2015	13466
4. Elliott Plaintiffs' / Appellants' Statement Of Issues And Designation Of Items To Be Included In The Record On Appeal	6/15/2015	13207
5. Sesay Plaintiffs' / Appellants' Statement Of Issues And Designation Of Items To Be Included In The Record On Appeal	6/15/2015	13208
6. Appellants' Statement of Issues on Appeal and Designation of Items to be Included in the Record on Appeal	6/16/2015	13219
7. Corrected Appellants' Statement of Issues on Appeal and Amended Designation of Items to be Included in the Record on Appeal	7/14/2015	13299
8. Bledsoe Plaintiffs' / Appellants' Statement Of Issues And Designation Of Items To Be Included In The Record On Appeal	8/14/2015	13379

<u>Description</u>	<u>Filing Date</u>	<u>Docket No.</u>
9. New GM MDL Complaint Letter, with Marked MDL Complaint, Pursuant to Scheduling Order dated September 3, 2015	9/23/2015	13469
10. New GM Peller Clients Marked Complaints Letter, with Attached Marked Peller Clients Complaints, Pursuant to Endorsed Order dated October 19, 2015	10/30/2015	13523
11. Errata Order Re Decision On Imputation, Punitive Damages, And Other No-Strike And No Dismissal Pleadings Issues	11/9/2015	13534
12. Notice of Motion By General Motors LLC Pursuant To 11 U.S.C. §§ 105 And 363 To Enforce The Bankruptcy Courts July 5, 2009 Sale Order And Injunction, and The Rulings in Connection Therewith (Veronica Alaine Fox, Claudia Lemus, Tammie Chapman and Constance Haynes-Tibbetts)	6/1/2016	13634
13. Joint letter Regarding the Impact of <i>In re Tronox Inc.</i> on 2016 Threshold Issue No. 2 as it Relates to Independent Claims	5/10/2017	13930
14. Response to May 5, 2017 Letter from Counsel to New GM	5/12/2017	13935

Dated: August 22, 2017

Respectfully submitted,

GOODWIN PROCTER LLP

By: /s/ William P. Weintraub
William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
T: 212-813-8800
E: wweintraub@goodwinlaw.com
E: gfox@goodwinlaw.com

Counsel to Those Certain Post-Closing Accident Plaintiffs Represented By Butler Wooten & Peak LLP, Denney & Barrett, P.C., Hilliard Muñoz Gonzales L.L.P., and Turner & Associates, P.A.